



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

1 CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023

March 24, 2009

Barbara Kwetz, Director
Planning and Evaluation Division
Bureau of Waste Prevention
Department of Environmental Protection
One Winter Street
Boston, Massachusetts 02108

Dear Ms Kwetz:

EPA staff have reviewed the draft Massachusetts Regional Haze State Implementation Plan (SIP), dated November 21, 2008. Recent conversations with DEP staff indicate that Massachusetts is in the process of significantly revising the BART (Best Available Retrofit Technology) portion of the draft SIP. Therefore, as requested, we are sending you our comments on the remaining portions of the draft SIP and will address BART issues at a later time. You will find EPA's comments in the Enclosure.

If you have any questions on these comments, please contact Anne McWilliams at (617) 918-1697.

Sincerely,

A handwritten signature in cursive script, reading "Anne Arnold", is positioned above the typed name.

Anne Arnold, Manager
Air Quality Planning Unit

Enclosure

cc: Aimee Powelka (MA DEP)

Enclosure

EPA Comments on Massachusetts November 21, 2008 Draft Regional Haze SIP

Note – EPA’s comments on BART issues will be provided at a later time.

Chapter 1: Background on Haze

1) In the third paragraph of Section 1.1, Massachusetts states, “on the worst 20% of days, visibility impairment in the Northeast and Mid-Atlantic Class 1 areas ranges from about 25 to 30 dv.” This statement is inconsistent with the data presented later in Table 5 in Section 3.2. The table lists the baseline 20% worst visibility for MANE-VU Class I areas as 21.7 to 29.0 dv. In addition, in the Section 1.1 discussion, it would be helpful to include the visibility range (in kilometers or miles) on the worst 20% days to give the reader a better context.

Chapter 6: Emissions Inventory

2) In paragraph 4 of Section 6.1.1, Massachusetts states that it revised its inventory of area source heating oil emissions by adjusting the sulfur percent used to derive the emission factors from 1.0 to 0.3. Massachusetts should explain why this change was made.

3) Massachusetts should revise the first sentence of Section 6.1.3 to read as follows:

“A technical support document for the future year inventories is included in Appendix N and explains the data sources, methods, and results for future year emission forecasts for three years, five emission sectors, ~~two~~ three emission control scenarios...”

4) Massachusetts should clarify which of the three emission control scenarios for 2018 emissions is being presented in Sections 6.4 and 6.5.

Chapter 7: Sources

5) Massachusetts should explain the increase in ammonia emissions from 1999 to 2002 shown in Figure 37.

Chapter 10: Long-Term Strategy

6) In Section 10.4.4, Massachusetts discusses the MANE-VU low-sulfur fuel oil strategy. The DEP should include more detail on the specific steps Massachusetts plans to take to implement this strategy and make it federally enforceable, especially with regard to the first “outer zone” state milestone of 2014.

7) The MANE-VU EGU strategy includes 90 percent or greater reduction in SO₂ emissions from 167 stacks shown to impact the MANE-VU Class 1 areas. Massachusetts is home to 10 of these stacks. In discussing this strategy in Section 10.4.6, Massachusetts references implementation of 310 CMR 7.29, which limits SO₂ emissions to 6.0 lb/MWh on a rolling monthly average. This rule, however, is not currently federally enforceable. Massachusetts should submit this rule to EPA as a SIP revision. Also, Massachusetts estimates that SO₂ emissions from these 10 stacks will be reduced by 73 percent. What additional measures is Massachusetts considering to meet the SO₂ reduction shortfall?

8) In Section 10.5.3, Massachusetts references the proposal of 310 CMR 7.26(50) to control the emissions from outdoor wood-fired boilers. Massachusetts should update this discussion to reflect the adoption of this regulation and the DEP should submit this rule to EPA as a SIP revision.

Footnotes

9) Footnote 5 on page 15 needs to be updated in light of the CAIR remand. In addition, EPA recommends that Massachusetts include more discussion on CAIR reductions beyond this short footnote.

10) Footnote 20 in Section 8.2 is inaccurate and should be revised. We are aware of at least two states (Connecticut and Maryland) that are pursuing the alternate BART option.